1 2 3 4 5 6 7 8 9	Marc M. Seltzer (54534) mseltzer@susmangodfrey.com Steven G. Sklaver (237612) ssklaver@susmangodfrey.com Oleg Elkhunovich (269238) oelkhunovich@susmangodfrey.com Krysta Kauble Pachman (280951) kpachman@susmangodfrey.com Nicholas N. Spear (304281) nspear@susmangodfrey.com SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 Facsimile: (310) 789-3150 James Q. Taylor-Copeland (284743) TAYLOR-COPELAND LAW 501 W. Broadway, Suite 800 San Diego, CA 92101 james@taylorcopelandlaw.com Talankong (610) 400, 4044	
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13	Counsel for Lead Plaintiff Bradley Sostack	
14	UNITED STATES	S DISTRICT COURT
15		RICT OF CALIFORNIA D DIVISION
16		
17 18	In re RIPPLE LABS, INC. LITIGATION	Case No. 4:18-cv-06753-PJH (RMI) Formerly Consolidated/Related Case No. 4:21-cv-06518 (Closed 9-27-21)
9	This Document Relates to:	<u>CLASS ACTION</u>
20	All Actions	ADMINISTRATIVE MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL SHOULD BE SEALED
22		Consolidated First Amended Complaint Filed: March 25, 2020
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	ADMINISTRATIVE MOTION	PURSUANT TO CIV. L.R. 79-5(f)

Pursuant to Civil Local Rule 79-5(f), Lead Plaintiff Bradley Sostack respectfully asks the Court to consider whether the following materials, filed in relation to Lead Plaintiff's motion for class certification, should be sealed. These documents have been designated as confidential by Defendants Ripple Labs, Inc., XRP II, LLC, and Bradley Garlinghouse; or the identified third parties.

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Basis for Sealing
Lead Plaintiff's Motion for Class Certification and Memorandum of Points and Authorities in Support Thereof	 Defendants Securities and Exchange Commission (third party) Chris Larsen (third party) GSR (third party) Poloniex (third party) 	Portions highlighted in yellow throughout	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Declaration of Nicholas N. Spear	• Defendants	Portions highlighted in yellow throughout	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 1 to the Spear Declaration (RPLI_00623257)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 2 to the Spear Declaration (RPLI_00339374)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the

			Revised Stipulated Protective Order (Di 143)
Exhibit 3 to the Spear Declaration (RPLI_00339208)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (DI 143)
Exhibit 4 to the Spear Declaration (RPLI_00294765)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (DI 143)
Exhibit 6 to the Spear Declaration (RPLI_00555674)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Diamed 143)
Exhibit 7 to the Spear Declaration (RPLI_00160553)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential — Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 8 to the Spear Declaration (RPLI_01641423)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes

IVE MOTION PURSUANT TO CIV. L.R. 79-5(f

			Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 9 to the Spear Declaration (RPLI_01931261)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 10 to the Spear Declaration (RPLI_00276363)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 11 to the Spear Declaration (RPLI_00000041)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (De 143)
Exhibit 12 to the Spear Declaration (RPLI_01030511)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dk 143)
Exhibit 13 to the Spear Declaration (RPLI_01673352)	Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia

1 2 3				- Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
4 5	Exhibit 14 to the	Defendants	Entirety of the	Refers to material
6	Spear Declaration (RPLI_00177952)		document	designated "Confidential" or
7				"Highly Confidential – Attorneys' Eyes
8				Only" pursuant to the Revised Stipulated
9				Protective Order (Dkt. 143)
10	Exhibit 15 to the	Defendants	Entirety of the	Refers to material
11	Spear Declaration (RPLI 00978159)		document	designated "Confidential" or
12				"Highly Confidential – Attorneys' Eyes
13				Only" pursuant to the Revised Stipulated
14 15				Protective Order (Dkt. 143)
16	Exhibit 16 to the	Defendants	Entirety of the	Refers to material
17	Spear Declaration (RPLI_01018075)		document	designated "Confidential" or
18				"Highly Confidential – Attorneys' Eyes
19				Only" pursuant to the Revised Stipulated
20				Protective Order (Dkt. 143)
21	Exhibit 17 to the	Defendants	Entirety of the	Refers to material
22	Spear Declaration	Detendants	document	designated
23	(RPLI_01017858)			"Confidential" or "Highly Confidential
24				- Attorneys' Eyes Only" pursuant to the
25				Revised Stipulated Protective Order (Dkt.
26				143)
2728	Exhibit 18 to the Spear Declaration (RPLI 00327099)	Defendants	Entirety of the document	Refers to material designated "Confidential" or
		<u> </u>	5	

1 2				"Highly Confidential – Attorneys' Eyes Only" pursuant to the
3				Revised Stipulated Protective Order (Dkt.
4				143)
5	Exhibit 19 to the Spear Declaration	• Defendants	Entirety of the document	Refers to material designated
6	(RPLI_00924526)		document	"Confidential" or
7				"Highly Confidential – Attorneys' Eyes
8				Only" pursuant to the Revised Stipulated
9				Protective Order (Dkt. 143)
10	Exhibit 20 to the	Defendants	Entirety of the	Refers to material
11 12	Spear Declaration (RPLI 00753899)	Defendants	document	designated "Confidential" or
13				"Highly Confidential – Attorneys' Eyes
14				Only" pursuant to the Revised Stipulated
15				Protective Order (Dkt. 143)
16	Exhibit 21 to the	Defendants	Entirety of the	Refers to material
17 18	Spear Declaration (RPLI_03572534)		document	designated "Confidential" or
19				"Highly Confidential – Attorneys' Eyes
20				Only" pursuant to the Revised Stipulated
21				Protective Order (Dkt. 143)
22	Exhibit 22 to the	Defendants	Entirety of the	Refers to material
23	Spear Declaration (RPLI_00157641)		document	designated "Confidential" or
24	(KI DI_0013/041)			"Highly Confidential
25				- Attorneys' Eyes Only" pursuant to the
26				Revised Stipulated Protective Order (Dkt.
27				143)
28				

Exhibit 23 to the Spear Declaration (RPLI_00380882)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 24 to the Spear Declaration (RPLI_00308325)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 25 to the Spear Declaration (RPLI_01022302)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 26 to the Spear Declaration (RPLI_00000943)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 27 to the Spear Declaration (RPLI_01371390)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated

			Protective Order (D 143)
Exhibit 28 to the Spear Declaration (RPLI_03455221)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (D. 143)
Exhibit 29 to the Spear Declaration (RPLI_01675579)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (D. 143)
Exhibit 30 to the Spear Declaration (RPLI_01169730)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (D. 143)
Exhibit 31 to the Spear Declaration (RPLI_01674718)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" — Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (D. 143)
Exhibit 32 to the Spear Declaration (RPLI_01169610)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the

11104368v1/016433

			Revised Stipulated Protective Order (DI 143)
Exhibit 33 to the Spear Declaration (RPLI_01169378)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (DI 143)
Exhibit 34 to the Spear Declaration (RPLI_01675072)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidential" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (DI 143)
Exhibit 35 to the Spear Declaration (RPLI_03496477)	 Defendants Securities and Exchange Commission (third party) GSR (third party) Chris Larsen (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dia 143)
Exhibit 36 to the Spear Declaration (RPLI_03570145)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidential" – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (DI 143)
Exhibit 37 to the Spear Declaration (RPLI_03566384)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia" – Attorneys' Eyes

			Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 38 to the Spear Declaration (RPLI_03568452)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 39 to the Spear Declaration (RPLI_03565597)	 Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 40 to the Spear Declaration (RPLI_03566726)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 41 to the Spear Declaration (RPLI_03564173)	• Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia – Attorneys' Eyes Only" pursuant to th Revised Stipulated Protective Order (DI 143)
Exhibit 42 to the Spear Declaration (Defendants'	Defendants	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidentia

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1 2 3	10/31/22 Rog Resp.)			- Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
4 5 6 7 8 9	Exhibit 43 to the Spear Declaration (POLO_SOSTACK _00000001)	DefendantsPoloniex (third party)	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
10 11 12 13 14 15	Exhibit 64 (Declaration of Cristian Gil)	 Defendants GSR (third party) Chris Larsen (third party) 	Entirety of the declaration	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
16	Pursuant to C	ivil Local Rule 79-5(f), De	fendants and third pa	arties, as the Designating
17	Parties, bears the respe	onsibility to establish that its	designated material is	s sealable.
18	Dated: November 18,	2022 SUSI	MAN GODFREY L.L.	Р.

19 By /s/ Nicholas N. Spear Marc M. Seltzer (54534) 20 Steven G. Sklaver (237612) Oleg Elkhunovich (269238) 21 Krysta Kauble Pachman (280951) Nicholas N. Spear (304281) 22 SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 23 Los Angeles, CA 90067-6029 Telephone: (310) 789-3100 24 Facsimile: (310) 789-3150 mseltzer@susmangodfrey.com 25 ssklaver@susmangodfrey.com oelkhunovich@susmangodfrey.com 26 kpachman@susmangodfrey.com nspear@susmangodfrey.com 27 James Q. Taylor-Copeland (284743) 28 TAYLOR-COPELAND LAW 501 W. Broadway, Suite 800

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